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17 **UNITED STATES DISTRICT COURT**
18 **NORTHERN DISTRICT OF CALIFORNIA**
19 **SAN FRANCISCO DIVISION**

20 AMERICAN FEDERATION OF
21 GOVERNMENT EMPLOYEES, AFL-CIO, et
al.,

22 Plaintiffs,

23 v.

24 DONALD J. TRUMP, in his official capacity as
25 President of the United States, et al.,

26 Defendants.
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Case No.: 3:25-cv-03070-JD

**DECLARATION OF DANIEL T.
RONNEBERG**

DECLARATION OF DANIEL T. RONNEBERG

I, Daniel T. Ronneberg, declare as follows:

1. I am over 18 years of age and competent to give this declaration. This declaration is based on my personal knowledge, information, and belief.

2. I am the president of the Federal Aviation Administration Employees Union, Local 1653, District Council 20, American Federation of State, County and Municipal Employees, AFL-CIO ("AFSCME Local 1653" or the "Union"). AFSCME Local 1653 is affiliated with AFSCME District Council 20. District Council 20, through its constituent local unions like Local 1653, represents federal civilian employees in agencies and departments across the federal government.

3. Both now and before becoming the local union president, I have been employed by the Federal Aviation Administration ("FAA") as a Regulation Analyst in the Office of Rulemaking. The FAA is an administration within the U.S. Department of Transportation ("DOT"). I was previously an Aviation Safety Inspector for the FAA. The FAA's mission is to provide the safest, most efficient aerospace system in the world. I have been employed with the FAA for 15 years and I am a veteran, having previously served in the U.S. Air Force for 14 years as a pilot.

4. AFSCME Local 1653 represents a bargaining unit of over 2,000 non-supervisory civil servants who work for the FAA. These employees include Aviation Safety Inspectors, Regulation Analysts, Accident Investigators, Economists, Computer Scientists, Program Managers, Administrative Staff and Office Assistants, Operation Research Analysts, Policy Analysts, Technical Operations Specialists, Airport Inspectors, and others. The Local also represents Attorneys at FAA working in the Air Traffic Organization, Aviation Safety, and the General Counsel's Office. Also in the bargaining unit are employees who work within the Air

1 Traffic Organization and Aviation Safety departments at the FAA's headquarters in Washington,
2 D.C.

3 **Speech and Petitioning Activity**

4 5. AFSCME Local 1653 has been outspoken in opposing Trump administration
5 policies that we believe are unlawful. Since President Trump took office, my local has filed almost
6 40 grievances under the negotiated grievance procedure challenging the FAA's actions under the
7 new administration, including grievances related to issues around telework, return-to-office, and
8 unisex bathrooms.
9

10 6. On February 19, 2025, several unions representing federal employees, including
11 AFSCME and the American Federation of Government Employees (AFGE), brought suit in
12 *AFGE, at al. v. OPM and Ezell*, Case No. 3:25-cv-01780 (N.D. Cal. filed Feb. 19, 2025) against
13 OPM and Director Ezell for illegally terminating probationary employees and sending agencies
14 "standardized notices of termination, drafted by OPM, that falsely state that the terminations are
15 for performance reasons."
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17 7. In that case, I provided a declaration in my capacity as the president and a member
18 of AFSCME Local 1653 that supported the litigation and that was critical of the government's
19 actions to illegally terminate AFSCME Local 1653 members at the FAA and thousands of other
20 federal employees. This declaration provided facts that were important to proving AFSCME's case
21 in the litigation.
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23 8. On February 28, 2025, Judge William Alsup granted a temporary restraining order
24 (TRO) that temporarily enjoined President Trump's administration from terminating probationary
25 employees at six federal agencies and held that OPM's memos directing the termination of
26 probationary workers were "unlawful, invalid, and must be stopped and rescinded." On March 13,
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1 2025, Judge Alsup held a preliminary injunction hearing and extended the TRO, converting it into
2 a preliminary injunction as well as ordering the government to reinstate thousands of probationary
3 employees.

4 9. AFSCME's highly publicized litigation activity in opposing the Trump
5 administration's actions to indiscriminately terminate thousands of probationary employees under
6 the false pretext of "performance" has drawn the attention of the Trump administration.

7
8 10. In addition to AFSCME's litigation challenging the current Administration's
9 termination of probationary employees and other executive actions, which have come to the
10 attention of the Trump administration, President Trump has previously targeted FAA employees.
11 On January 31, 2025, at a White House press briefing, the President suggested, without any
12 evidence, that diversity initiatives at the FAA could be to blame for a deadly crash between a
13 passenger plane and an Army helicopter in Washington, D.C.

14
15 **Effects of the March 27, 2025 Executive Order**

16 11. The injuries suffered by AFSCME and its members who are affected by the
17 President's March 27, 2025 executive order ("EO") titled *Exclusions from Federal Labor-*
18 *Management Relations Programs* are ongoing or imminent and will persist unless this Court
19 intervenes.

20 12. Our membership is well informed and paying close attention to this attack on our
21 collective bargaining rights, so we understand that while the EO does not *yet* deny us our collective
22 bargaining rights, the process it sets up under Section 5, which delegates to the Secretary of
23 Transportation the authority to issue orders excluding additional employees who should lose their
24 collective bargaining rights under the FSLMRS, could very well result in us losing ours.

25
26 13. AFSCME Local 1653 bargaining unit members are terrified of losing their
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1 collective bargaining rights under the Federal Service Labor-Management Relations Statute
2 (FSLMRS). Our collective bargaining rights and union representation have been crucial to protect
3 our livelihoods and the safety mission of the FAA, especially in the face of the termination of
4 many probationary employee members. We know that without collective bargaining rights and
5 exclusive representation, it will be significantly more difficult for the union to provide services to
6 its members and fulfill its representational duties.

7
8 14. Additionally, through the Collective Bargaining Agreement (“CBA”), the union
9 has secured important rights and protections regarding terms and conditions of employment,
10 benefits, rules, a grievance procedure and other procedures of the workplace. This includes
11 establishing a negotiated grievance procedure to fairly resolve disputes between bargaining unit
12 employees and management; setting terms and conditions for leave, hours of duty, performance
13 evaluations, and overtime; establishing a recognition and award program; establishing professional
14 development and training standards; establishing occupational health and safety standards; and
15 providing transportation subsidies, among many other workplace protections and benefits. Under
16 the EO, those rights and protections for members would be removed.

17
18 15. I have spoken with members of AFSCME Local 1653, and although they are not
19 yet definitively excluded from collective bargaining rights by the EO, they fear that they will be
20 excluded under Section 5 of the EO, which delegates authority to the Secretary of Transportation
21 “to issue orders excluding any subdivision of the Department of Transportation, including the
22 Federal Aviation Administration, from Federal Service Labor-Management Relations Statute
23 coverage.” This fear is heightened by the fact that the FAA is among a small number of agencies
24 specifically named in the EO as agencies that may have collective bargaining rights stripped away.
25 The threat of having our union’s collective bargaining representation suspended has made our
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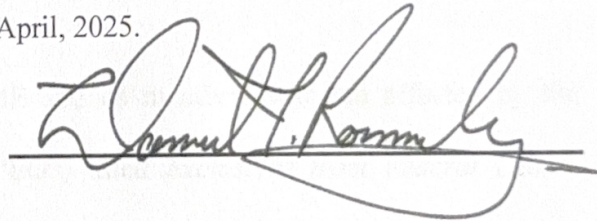
members hesitant to speak out in public against the Administration for fear that it may increase the likelihood that they lose their collective bargaining rights as a result.

16. I am concerned that, unless this Court intervenes in this case, AFSCME Local 1653 members will be targeted next by the EO. This looming threat of losing collective bargaining rights is having a chilling effect on union members' ability and willingness to associate with each other, engage in concerted activity, and speak up on workplace and public interest issues.

17. As a result of the March 27 Executive Order, I fear and am very concerned that by continuing to fight for our members at the FAA, especially including in our ongoing litigation regarding the mass termination of probationary employees, we are risking our collective bargaining rights.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed at Washington, D.C. on the 2nd day of April, 2025.



Daniel T. Ronneberg